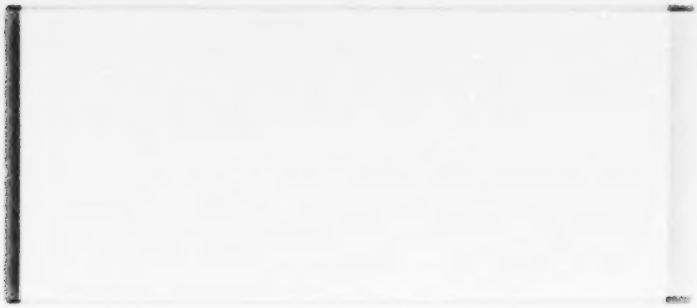

Saskatchewan

TECHNICAL REVIEW COMMENTS
ON THE
URANIUM CITY TO RABBIT LAKE
TRANSMISSION LINE PROJECT
ENVIRONMENTAL IMPACT STATEMENT

TECHNICAL REVIEW COMMENTS

on the

ENVIRONMENTAL IMPACT STATEMENT

for the proposed

URANIUM CITY TO RABBIT LAKE

TRANSMISSION LINE

as submitted by

SASKATCHEWAN POWER CORPORATION

Saskatchewan Environment

January, 1987

1.0 INTRODUCTION

The major goal of an Environmental Impact Assessment (EIA) is to provide the information necessary for government decision-makers to determine whether, from an environmental perspective, a proposed development should be allowed to proceed and, if so, under what conditions. As part of the environmental assessment process the project proponent is required to prepare an Environmental Impact Statement (EIS). The EIS documents the proponent's conclusions about how the project is likely to affect the environment (biophysical and socio-economic), and describes the measures the proponent will take to mitigate any negative environmental impacts and to enhance positive impacts. The EIS is made available for public review and comment; input received from the public, together with information generated during a technical review of project data, is provided to the Minister of Environment for his consideration.

To assist both the public and government decision-makers in reviewing the EIS and evaluating the environmental acceptability of the proposed development, Saskatchewan Environment prepares a written commentary on the project. These comments, based, in part, on input from several provincial government agencies, represent Saskatchewan Environment's evaluation of the environmental implications of the project, the proponent's conclusions regarding the environmental impacts predicted, the significance of these impacts, and the effectiveness of proposed

mitigative measures. In preparing the comments Saskatchewan Environment focuses on those areas where there may be significant residual impacts after proposed mitigative measures are implemented. The intent is to identify for the public the environmental trade-offs associated with the project; i.e., the environmental risks which must be accepted to realize the benefits associated with the project.

2.0 PROJECT DESCRIPTION

Saskatchewan Power Corporation (SPC) proposes to construct and operate a transmission line which would extend from the Uranium City area to the Eldor Mines' mine and mill development at Rabbit Lake, west of Wollaston Lake. This project has been proposed in recognition of the underutilized hydroelectric generation capacity near Uranium City and the high cost of diesel generation at the Rabbit Lake development. Sufficient power is available to supply the northern communities of Fond du Lac, Stony Rapids, Black Lake and Wollaston Post and SPC has therefore proposed the construction and operation of feeder lines to service those centres.

In addition to the transmission line, a number of ancillary facilities (both temporary and permanent) would be established. These would include electrical switching and sub-stations, supply depots, temporary work camps, etc. The major ancillary development being proposed is an access trail which would be

associated with the transmission line between Pine Channel, at the east end of Lake Athabasca, and Rabbit Lake.

Construction activities are expected to require as much as 1,205 man-months of non-specialized labour which might be provided by residents of communities in the project area. The total direct value of wages and salaries that could accrue to northern residents may reach $1.9 million. The cost of the transmission line project is expected to be about $43.7 million. Of this total, SPC expects to spend approximately $10.4 million on materials purchased in Saskatchewan and $22.4 million on the services of Saskatchewan contractors.

3.0 DEVELOPMENT OF AN ACCESS TRAIL

The provision of access along the right-of-way and access trail during the construction and post-construction periods has been identified by SPC, review agencies and residents of the project area as a major issue. The EIS correctly states that the presence of an access trail would be the most significant residual impact associated with the project.

Inter-community communications may be enhanced by the presence of a trail, and the possibility exists that any land transport system developed in the post-construction period might result in lower costs and easier movement of goods into and out of parts of the project area. Access provided by the trail could,

however, result in the overharvesting of resources (notably barren-ground caribou), the disturbance of important wildlife species, and significant effects on transportation services and the tourism industry.

SPC has not adequately established the need for an access trail in either the short or long terms. It is noted, for example, that a trail would not be constructed in the area north of Lake Athabasca. Further, routine inspections would be conducted with aircraft and the annual ground survey would be conducted in late winter utilizing snowmobiles. It is also stated that both minor and major unplanned maintenance would be completed, in almost all instances, by crews accessing problem sites by helicopter.

With regard to potential impacts on natural resources (and related businesses), SPC has suggested that little can be done to restrict access to the trail and right-of-way, and that management agencies would have to implement new programs or regulations to protect against the anticipated negative impacts. At the same time the corporation has proposed means by which use of the trail would be enhanced in the post-construction period (for example, by leaving river and stream crossing structures in place after construction).

If it is SPC's intention to construct a transmission line and, in the process, provide a publicly-accessible trail, then all

issues associated with post-construction use of the trail should have been addressed. Appropriate commitments with respect to the further assessment of impacts and the implementation of mitigative and remedial measures should also have been provided.

The lack of a detailed discussion on this matter is considered a major deficiency of the environmental impact statement.

4.0 TRANSMISSION LINE ROUTING

SPC acknowledged in the project proposal that routing of the transmission line to avoid sensitive areas would be an appropriate form of mitigation. Saskatchewan Environment and other regulatory agencies share this view and, as noted in the project-specific guidelines for this development, have stated that route selection would be considered a key component of the impact assessment program.

SPC has outlined reasons for selecting the more general routing; however, notwithstanding the apparent agreement as to the approach which should be followed in selecting a final alignment for the transmission line, the EIS illustrates that in several areas the project would traverse sensitive habitats and/or land use areas. For example:

- 29 "good" and 27 "moderately good" moose habitats occur along the line and approximately 18 such areas are crossed;

- of the 22 bald eagle nesting sites identified, 11 are within 1.6 km and 6 are within 500 m of the proposed centerline (1 or 2 of these 6 are on or immediately adjacent to the proposed right-of-way);
- 25 "moderate" or "highly sensitive" fish habitats occur at proposed or alternate trail crossing locations;
- 7 major aquatic systems considered sensitive with regard to possible overharvesting of fish stocks occur along the alignment;
- 75 species of plants considered to be rare in Saskatchewan, including 1 considered rare in Canada, may occur along the route (specific locations not identified);
- routing may affect/be affected by the site of the proposed Stony Rapids airstrip (location not identified);
- routing may affect 13 trappers whose traplines occur along the identified alignment (specific locations not identified).

Recognizing that adverse impacts will occur but that they can be minimized by rerouting to avoid sensitive areas, SPC has stated that the corporation will implement minor route adjustments, where possible, to avoid or maximize the distance of the line from important habitats or land use areas (for example, the shorelines of lakes, cliff faces, rapid zones on major rivers, outfitter fishing lakes).

Given that SPC has acknowledged the importance of the route selection process and that sensitive areas have (or could have) been identified during EIA study programs, the corporation should have illustrated, in the EIS, how the line would be routed so as to avoid sensitive habitats and land use areas.

On the basis of information provided in the EIS, and in particular the identified project schedule, any route adjustments which might be implemented at this time may not be significant. It has been noted, for example, that although SPC proposes to attempt to pass no closer than 1.6 km from bald eagle nest sites, the EIS indicates that nest trees may occur immediately adjacent to the right-of-way or may be removed. Similarly, although it is suggested that the development would be routed as much as possible away from outfitter lakes, in fact the identified line actually crosses such waterbodies.

Alternative routing of the access trail but not the transmission line in the Waterfound River and "Moose Creek" areas (as described in the Addendum) would seem to be of limited value as impacts might be realized in two areas instead of a single locale.

It is incumbent upon a proponent to document the locations of sensitive areas which might be affected by a development and to outline the measures which would be implemented to avoid or minimize adverse impacts. Where mitigation was to be in the form of routing, SPC should have described the alignment which was chosen so as to avoid these areas. Where sensitive habitats or land use areas could not be avoided, SPC should have stated why that was the case and what the implications of those actions are. Specific mitigative and environmental protection measures which would be implemented where sensitive areas cannot be avoided should also have been provided (see following discussion).

5.0 IMPACT MITIGATION

a) SPC has acknowledged that the disturbance of fish and wildlife resources (and associated habitats) is a potential concern and in several instances the EIS states that SPC will, if possible, avoid undertaking construction activities in sensitive habitats, particularly during the critical time periods for the species in question. However, if the proposed schedule is to be adhered to, it will be very difficult (if not impossible) for SPC to implement the scheduling constraints identified by the corporation as being appropriate mitigative procedures. A clear statement as to whether or not SPC would avoid or cease construction in these areas should have been

provided. Where the corporation proposes to proceed with construction in sensitive areas (during critical time periods or otherwise), it is incumbent upon SPC to identify potential impacts and to commit to mitigative measures which would be employed to alleviate adverse effects. Specific commitments have not been provided.

This is of particular importance with respect to barren-ground caribou. SPC should have provided a description of the mitigative action plan which would be followed if animals enter the area of construction. At this time it is not known what specifically SPC will do to ensure that disturbance is minimized and that access to the area is restricted.

b) SPC has not identified any mitigation measures or environmental protection procedures which would be implemented to alleviate potential adverse effects on rare plant species.

c) SPC states that the corporation would adhere to a number of published environmental protection guidelines which cover various aspects of the project. This statement contradicts others in the EIS as the guidelines recommend, among other things, that sensitive areas should be avoided and that activities should not take place during the critical time

periods for important species. Once again, it is not clear what specifically SPC is proposing with regard to mitigation.

6.0 SOCIO-ECONOMIC CONSIDERATIONS

a) The proposed development could result in major benefits with respect to employment, the provision of goods and services and the possible establishment or expansion of businesses. SPC has not identified any specific programs with respect to local hiring, the provision of training and the acquisition of local or regional goods and services, but has been and will continue to liaise with government agencies and other groups on such matters. A clear statement as to the corporation's policies and procedures regarding the maximization of local and regional benefits should have been provided.

b) Conversion from Diesel to Hydroelectric Power

The proposed development would result in the increased availability of less expensive electrical energy in northern communities. With regard to the conversion from diesel-generated power, SPC has not provided details as to any changes to community infrastructures which would be required, nor has the corporation identified who would be responsible and when the required changes would be/have to be made. This information had been requested.

The corporation has suggested that the transmission line project would provide more reliable power. However, it is noted that because the transmission line will be remote and not tied into the provincial distribution system, and because no firm back-up energy supplies are committed to the line, major power outages could last for several days. For this reason, northern residents and the mining development could not rely entirely on this source of electricity.

c) Impacts on Existing Transportation Services

At the present time the transport of goods into and out of the project area is dependent upon air transport, winter roads and summer barge services. The Lake Athabasca barge service is only marginally viable at this time and the department agrees with SPC's conclusion that the reduced amount of diesel fuel hauled by barge and/or the development of a land transport system along the access trail could eventually end that service.

The possibility of a land transport system being developed is acknowledged by SPC and it is stated that developers are merely awaiting the construction of the trail before initiating an overland haul system. As suggested by SPC, a land transport system could affect Black Lake, Stony Rapids and Fond du Lac in a positive way but could further isolate

the communities of Uranium City and Camsell Portage if the barge service ends.

It is important that the public realize that expectations regarding the costs and timely delivery of goods via the overland trail cannot be assured. The question of liability, should other persons utilize the right-of-way or access trail, has not been investigated by SPC.

d) Impacts on the Tourism Industry

The presence of the transmission line right-of-way and access trail could result in adverse impacts on the existing tourism industry which depends on the presence of fish and wildlife resources and, in part, on a clientele seeking a "wilderness experience". Both the physical presence of the project and the possible overharvesting of natural resources resulting from the provision of access are potential problems. This consideration received little attention in the EIS.

e) Impacts on Trapping

Residents of the project area have expressed concerns related to potential adverse impacts on trapping and 13 individual traplines might be affected by the project. SPC has acknowledged that negative impacts may occur during the construction and operation phases, but that compensation

would only be paid for damage to or disturbance of traps during the construction period.

SPC should have outlined the process which would be followed in assessing impacts and in determining whether and to what extent compensation would be paid. As well, a complete analysis would have addressed both the construction and post-construction periods.